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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

IN RE: Michael D. Goldfinger)	CASE NO.: 20-23959-JNP
)	
DEBTOR)	CHAPTER 13

**NOTICE OF MOTION TO SEEK AUTHORIZATION TO SELL REAL PROPERTY
AND AVOID JUDICIAL LIEN OF BANK OF AMERICA**

TO: SECURED CREDITORS AND ISABEL C. BALBOA, CHAPTER 13 STANDING
TRUSTEE

PLEASE TAKE NOTICE that the movant, Michael D. Goldfinger, through counsel, will make a motion on the 27th day of **July 2021**, at **11:00 a.m.** Or as soon thereafter as counsel may be heard before the Honorable Jerrold N. Poslusny, Jr., presiding, United States Bankruptcy Court, Mitchell H. Cohen U.S. Courthouse, Courtroom No. 4C, 4h Floor, 400 Cooper Street, Camden, NJ 08101 for an Order Authorizing the Debtor To Sell Real Property commonly known as 6 S. and 8 S.Garfield Ave., Wenonah, NJ 08090.

TAKE FURTHER NOTICE that the facts the Debtor relies upon, as set forth on the accompanying Certification, and the basis for the relief being requested, do not present complicated questions of fact or unique questions of law, it is hereby submitted that no brief is necessary in the Court's consideration of the within Motion.

PLEASE TAKE FURTHER NOTICE that if you contest this Motion, you must appear in Court on the date noted above and you are further required to file with the Court and serve on the undersigned a written response, in accordance with Rules of Court, no later than seven (7) days prior to the hearing date set forth herein. If a written response is not served and filed, the Court will treat this Motion as uncontested and may not conduct a hearing.

LAW OFFICES OF
RONALD E. NORMAN, LLC

DATED: June 28, 2021

BY: /s/Ronald E. Norman
Ronald E. Norman, Esq.